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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROSE FEAVER, an individual,
MYUNGSHUN SHIM, an individual,
ARTIN ADAMIAN, an individual,
individually, and on behalf of all others
similarly situated,

Plaintiffs,

v.

KAISER FOUNDATION HEALTH PLAN,
INC., KAISER FOUNDATION HOSPITALS,
and Does 1 through 50, Inclusive

Defendants.

CASE NO.: 3:15-CV-00890-EMC

Assigned To: Hon. Edward M. Chen

CLASS AND COLLECTIVE ACTION

**STIPULATION REGARDING
DEADLINE TO SUBMIT JOINT CASE
MANAGEMENT STATEMENT**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Defendants Kaiser Foundation Health Plan, Inc. and Kaiser Foundation Hospitals, Inc.
(collectively "Defendant") and Plaintiffs Rose Feaver, Artin Adamian, and Myungsun Shim
(collectively "Plaintiffs") (together, the "Parties"), by and through their respective counsel of

record, hereby stipulate as follows:

1. On January 5, 2016, the Court set a case management conference for February 18, 2016, and instructed the Parties to file an updated joint case management statement by February 11, 2016 (docket no. 38).

2. In its Order dated January 27, 2016 granting Plaintiffs' motion for conditional certification (docket no. 39), this Court instructed the Parties to file by February 16, 2016 a stipulation governing notice to the conditionally certified collective.

3. The case deadlines that the Parties anticipate addressing in the updated joint case management statement are dependent in part on the timeline for notice to the conditionally certified collective, which the Parties will address in the joint stipulation regarding notice due February 16, 2016.

4. For this reason, the Parties request an extension of time to file the joint case management statement through February 16, 2016, which would allow them to complete and file the two documents together.

Dated: February 10, 2016

SEYFARTH SHAW, LLP

By: Jessica S. Lieberman
Jessica S. Lieberman (pro hac vice)
Attorneys for Defendant

Dated: February 10, 2016

KEARNEY LITTLEFIELD, LLP
STONEBARGER LAW, APC

By: Prescott W. Littlefield
Prescott W. Littlefield
Attorneys for Plaintiff

I, Jessica S. Lieberman, hereby attest that pursuant to LR 5-1(i) I have on file concurrence for any signatures indicated by a "conformed" signature (/s/) within this e-filed document.

/s/ Jessica S. Lieberman
Jessica S. Lieberman

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated: 2/16/16

